

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

Ahmed Abedelmajid,

Debtor.

Chapter 7

Case No. 24-04223

Hon. Timothy A. Barnes

NOTICE OF MOTION

Please take notice that, on **Wednesday, July 10, 2024, at 9:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Timothy A. Barnes, United States Bankruptcy Judge for the Northern District of Illinois, or any judge sitting in that judge's place, **either** in courtroom 744 of the Everett McKinley Dirksen United States Courthouse **or** electronically as described below, and present the **Trustee's Motion to Authorize Rule 2004 Examination of Examinees**, a copy of which is hereby served upon you.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276, and the passcode is 433658. The meeting ID can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Dated: July 2, 2024

Richard M. Fogel, not
individually, but as the chapter 7
trustee for the bankruptcy estate of
Ahmed Abedelmajid

By: /s/ Ariane Holtschlag
One of His Attorneys

Jeffrey K. Paulsen (6300528)
Ariane Holtschlag (6294327)
Paulsen+HoltschlagLLC
1245 S. Michigan, #115
Chicago, IL 60605
Tel: (773) 645-0737
Email: aholtschlag@ph-firm.com

CERTIFICATE OF SERVICE

I, Ariane Holtschlag, an attorney,

☒ an attorney, certify

—or—

☐ a non-attorney, declare under penalty of perjury under the laws of the United States of America

that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method shown on July 2, 2024.

/s/ Ariane Holtschlag

SERVICE LIST

Registrants in the Case

(Service via ECF)

Shady A. Bolis	sbolis@victorylawoffice.com
Richard M. Fogel	fogeltrustee@gmail.com, il72@ecfcbis.com;richard-fogel- 1441@ecf.pacerpro.com
Ariane Holtschlag	aholtschlag@ph-firm.com, aholtschlag_277@ecf.courtdrive.com
Patrick S Layng	USTPRegion11.ES.ECF@usdoj.gov

Non-Registrants

(Service via first-class U.S. Mail or certified mail where indicated)

Ahmed Abdelmajid 15723 S Sunset Ridge Ct, Unit 2S Orland Park, IL 60462	Amin Abdelmajid 15723 S Sunset Ridge Ct, Unit 2S Orland Park, IL 60462
Ayah Abdelmajid 15723 S Sunset Ridge Ct, Unit 2S Orland Park, IL 60462	Global Web Services, Inc. Amin Abdelmajid, Pres and RA 15723 S Sunset Ridge Ct, Unit 2S Orland Park, IL 60462
Global Tech Wireless, Inc. Ahmed Abdelmajid, Pres and RA 15723 S Sunset Ridge Ct, Unit 2S Orland Park, IL 60462	Citibank, N.A. Attn: Sunil Garg, CEO 5800 S Corporate Pl Sioux Falls, SD 57108 <i>By certified mail</i>

B F A C Ltd. D/B/A Baste Financial Tax - Accounting – Consulting Naseim Baste, R.A. 11150 S Harlem Ave. Worth, IL 60482	
---	--

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

Ahmed Abdelmajid,

Debtor.

Chapter 7

Case No. 24-04223

Hon. Timothy A. Barnes

**TRUSTEE'S MOTION TO AUTHORIZE RULE 2004
EXAMINATION OF EXAMINEES**

Richard M. Fogel, not individually but as the chapter 7 trustee (the “*Trustee*”) of the bankruptcy estate (the “Estate”) of Ahmed Abdelmajid (the “*Debtor*”) respectfully requests an order from this Court authorizing the Trustee to conduct Rule 2004 examinations of Ahmed Abdelmajid, Ayah Abdelmajid, Amin Abdelmajid, Global Web Services, Inc., Global Tech Wireless, Inc., Citibank, N.A., and Baste Financial (collectively, the “*Examinees*”) pursuant to Fed. R. Bankr. P. (“*Bankruptcy Rule*”) 2004.

In support of this motion the Trustee states as follows:

JURISDICTION

1. The Court has jurisdiction over this motion pursuant to, among other things, 28 U.S.C. § 1334. The consideration of this motion is a core matter under 28 U.S.C. § 157.

BACKGROUND

2. On March 22, 2024 (the “*Petition Date*”), the Debtor filed a voluntary petition for relief under Chapter 7 of title 11, United States Code (11 U.S.C. §§ 101, et seq. (the “*Bankruptcy Code*”)), in the United States

Bankruptcy Court for the Northern District of Illinois, Eastern Division commencing the above referenced case (the “**Case**”).

3. Richard M. Fogel was appointed as the interim trustee in the Case pursuant 11 U.S.C. § 701 and now serves as the permanent trustee in the Case. The Trustee is duly qualified and has all the powers of a trustee under, among other provisions, 11 U.S.C. § 704.

4. The Debtor’s initial meeting of creditors took place on May 8, 2024.

5. The Trustee continues to investigate in this Case, including potential avoidance actions and undisclosed assets. The Trustee anticipates that the Examinees each have documents or other information related to the assets and/or financial affairs of the Debtor.

6. Therefore, the Trustee requests the authority to take the 2004 examinations of the Examinees in order to obtain more information and documents regarding assets and transfers of the Debtor.

DISCUSSION

7. Under Bankruptcy Rule 2004, the Trustee is entitled to examine the Debtor(s) and other parties concerning the acts, conduct, property, liabilities and financial condition of the Debtor(s) or any matter which may affect the administration of the Estate. Upon entry of an order authorizing an examination pursuant to Rule 2004, the production of documents and

attendance of witnesses for examination may be compelled by subpoena as provided in Bankruptcy Rule 9016. Fed. R. Bankr. P. 2004(c).

8. It is generally recognized that “[t]he scope of inquiry under Bankruptcy Rule 2004 is very broad. Great latitude of inquiry is ordinarily permitted.” *In re Handy Andy Home Improvement Centers, Inc.*, 199 B.R. 376, 379 (Bankr. N.D. Ill. 1996). Because “the primary purpose of a Rule 2004 examination is to permit the trustee to quickly ascertain the extent and location of the estate’s assets,” courts recognize that Rule 2004 allows for a “fishing expedition” of the creditors and other parties that had dealings with the debtor without the limits placed upon an examination under the Federal Rules of Civil Procedure. *Id.* at 380. See also *Pontikes v. SIP Claimants* (In re Comdisco, Inc.), No. 06 C 1535, 2006 WL 2375458, at *6 (N.D. Ill. Aug. 14, 2006); *In re Wilcher*, 56 B.R. 428, 433 (Bankr. N.D. Ill. 1985).

9. Under the plain language of Bankruptcy Rule 2004, the Trustee is entitled to conduct a Rule 2004 examination of the Examinees including requesting the production of documents and taking oral examinations, in order to obtain the information and documents needed for an effective administration of this Estate.

WHEREFORE, the Trustee requests that the Court enter an order authorizing the Trustee to conduct 2004 examinations of the Examinees

and granting the Trustee such other and further relief as is just and proper.

Dated: July 2, 2024

Richard M. Fogel, not
individually, but as the chapter 7
trustee of the bankruptcy estate of
Ahmed Abedelmajid

By: /s/ Ariane Holtschlag
One of His Attorneys

Jeffrey K. Paulsen (6300528)
Ariane Holtschlag (6294327)
Paulsen+HoltschlagLLC
1245 S. Michigan, #115
Chicago, IL 60605
Tel: (773) 645-0737
Email: aholtschlag@ph-firm.com